

**Riva, Steven**

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**From:** Angel Berrios [Angel.Berrios@erm.com]  
**Sent:** Wednesday, July 17, 2013 6:13 PM  
**To:** Riva, Steven; Sierra Torres, Luis R. (LuisSierra@jca.gobierno.pr)  
**Cc:** leimarysdelgado@jca.gobierno.pr; Dholakia, Umesh; Claudio, Francisco  
**Subject:** 40 CFR Part 60 Subpart LLLL Essroc San Juan Inc. Exemption Letter  
**Attachments:** Essroc San Juan Inc. Exemption Claim 40 CFR 60 Subpart LLLL .pdf

Essroc San Juan Inc, is in the process of obtaining the Puerto Rico Environmental Quality Board construction air permit for the use of biomass as a fuel in their facility. One of the components that will be used as fuel is Biosolids Class A. The use of biomass which includes Biosolids Class A mixed with coal or oil on specification will be used to generate necessary heat in the cement kiln. On March 29, 2013, EPA made a determination that the use of biomass (includes Biosolids Class A) will not trigger PSD requirements. The use of this type of biomass will be in compliance with the requirements established under 40 CFR Part 241 Solid Wastes Used as Fuels or Ingredients in Combustion Units.

Since Essroc San Juan Inc. is not located at a wastewater treatment plant as required under 40 CFR Part 60 Subpart LLLL Standards of Performance for New Sewage Sludge Incineration Units, attached is an exemption claim as required by this rule (§60.4780). Since the Biosolids Class A will be used as a fuel in compliance with requirements of 40 CFR Part 241 Essroc will continue to comply with the emission limits and requirements established under section 112 of the Clean Air Act 40 CFR Part 63 Subpart LLL National Emission Standards for Hazardous Air Pollutants for the Portland Cement Manufacturing Industry.

Attached is an advance copy of the letter that will be mailed to your offices.

If you have any questions regarding this letter you can contact me or Beatriz Rivera at (787) 721-5878 or via email at [beatriz.rivera@essroc.com](mailto:beatriz.rivera@essroc.com).

**Angel O. Berrios Silvestre, P.E.**  
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**Essroc San Juan**  
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P.O. Box 366698

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San Juan, P. R. 00936-6698

Fax. 1-787-883-5747

July 17, 2013

Ms. Judith A. Enck  
Environmental Protection Agency  
290 Broadway  
New York, NY 10007-1866

**RE: Exemption Claim  
40 CFR Part 60 Subpart LLLL – Standards of  
Performance for New Sewage Sludge  
Incineration Units**

Dear Ms.Enck:

On behalf of Essroc San Juan Inc. and in accordance with the requirements on the reference rule we are requesting an exemption under the requirements of §60.4780. This section exempts combustion units that incinerate sewage sludge and are not located at wastewater treatment facilities. In our case we will use Biosolids Class A as a fuel as established under the requirements of 40 CFR Part 241.

The following is the information of our facility:

Name:	Essroc San Juan Inc.
Location:	State Road 2 km 26.7 Dorado, P.R.
Emission Name:	Kiln 3
Emission Unit Number:	EU501
Exemption Claim:	Not Located at Wastewater Treatment Plant

If you have any questions or comments do not hesitate to contact Beatriz Rivera at (787) or via email: [beatriz.rivera@essroc.com](mailto:beatriz.rivera@essroc.com) or Angel O. Berrios at (787)622-0808 or via email: [angel.berrios@erm.com](mailto:angel.berrios@erm.com).

Cordially,



Beatriz Rivera

Environmental Engineering

c. Luis Sierra  
Manager Air Quality Area  
Environmental Quality Board

Steven Riva  
Permitting Section, Air Programs Branch  
EPA Region 2



**Essroc San Juan**  
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Fax: 787-883-5747

July 23, 2013

29 JUL 2013 RCVD

Ms. Judith A. Enck  
Environmental Protection Agency  
290 Broadway  
New York, NY 10007-1866

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If you have any questions or comments do not hesitate to contact Beatriz Rivera at (787) 883-3500 or via email: [beatriz.rivera@essroc.com](mailto:beatriz.rivera@essroc.com) or Angel O. Berrios at (787)622-0808 or via email: [angel.berrios@erm.com](mailto:angel.berrios@erm.com).

Cordially,

A handwritten signature in dark ink, appearing to read 'Beatriz Rivera', is written over the printed name.

Beatriz Rivera

Environmental Engineering

c. Luis Sierra  
Manager Air Quality Area  
Environmental Quality Board

Steven Riva  
Permitting Section, Air Programs Branch  
EPA Region 2

